

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
2016 Biennial Review of Telecommunications)	WT Docket No. 16-138, WC Docket
Regulation)	No. 16-132, IB Docket No. 16-131,
)	PS Docket No. 16-128
)	

**REPLY COMMENTS OF
NEXT CENTURY CITIES**

January 3, 2017

Next Century Cities (NCC) is a nationwide coalition of mayors and local government leaders committed to bringing the benefits of fast, affordable, reliable broadband internet access to communities across the nation. NCC appreciates the timely opportunity to offer comments in the Commission's Biennial Review. Our more than 150 communities range from cities as large as Los Angeles, California, to tiny communities like Alford, Massachusetts¹.

Our members tell us daily about their struggles to promote vibrant competition and connect all households to affordable broadband internet access service. They consistently point to the economic and community development benefits of ubiquitous affordable broadband.

NCC members employ diverse models to achieve their broadband goals, including public provision and innovative public private partnerships. They are focused on universal service, and particularly connectivity in historically underserved areas.

As such, NCC members urge caution in the Biennial Review. Though NCC did not file comments during the Technology Transitions proceeding, we respect the thoughtful, multi-stakeholder process it represented. Commenters from across industry, government, and the public interest community offered detailed comment throughout that deliberative proceeding, the result of which included compromises for all involved.

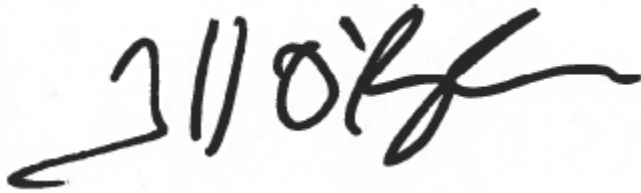
We regularly communicated with our members about what the IP Transition would mean for them and their community members. They raised concerns, above all,

¹ An up to date list of Next Century Cities members is available at www.nextcenturycities.org/member-cities

about the process for service discontinuation. Members were universally concerned that the FCC might adopt a policy regime that facilitated massive disconnection of historically underserved localities.

Therefore, any revision of the rules governing the IP Transition should be similarly thoughtful, deliberative, and multi-stakeholder. The Biennial Review, with its necessarily broad frame seems ill-suited to revisiting so massive and detailed an undertaking.

Sincerely,

A handwritten signature in black ink, appearing to read "T O'Boyle", with a stylized flourish at the end.

Todd O'Boyle

Deputy Director

Next Century Cities